

1 [COUNSEL LISTED ON SIGNATURE PAGES]

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5 UNITED STATES DISTRICT COURT
6 NORTHERN DISTRICT OF CALIFORNIA
7 SAN FRANCISCO DIVISION

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9 BLACKBERRY LIMITED, a Canadian
corporation,

10 Plaintiff,

11 vs.

12 TYPO PRODUCTS LLC, a Nevada limited
liability company, and SHOW MEDIA LLC, a
Nevada Limited Liability Company

13 Defendant.

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15 BLACKBERRY LIMITED, a Canadian
corporation,

16 Plaintiff,

17 vs.

18 TYPO PRODUCTS LLC; TYPO
INNOVATIONS, LLC; SHOW MEDIA LLC;
HALLIER INVESTMENTS, LLC, all Nevada
Limited Liability Companies, and
LAURENCE HALLIER, an individual,

19 Defendants.

20 Case No. 3:14-cv-00023-WHO

21 **JOINT MOTION TO DISMISS**

22 Case No. 3:15-cv-00715-WHO

23 **JOINT MOTION TO DISMISS**

Pursuant to Federal Rule of Civil Procedure 41 and the confidential Settlement Agreement between Plaintiff BlackBerry Limited (“BlackBerry”) and Defendants Typo Products LLC, Typo Innovations, LLC, Show Media, LLC, Hallier Investments LLC and Laurence Hallier (“Defendants”), BlackBerry and Defendants jointly move to dismiss BlackBerry’s claims for relief against Defendants in these litigations with prejudice and Defendants’ claims, defenses and/or counterclaims for relief against BlackBerry in these litigations with prejudice. BlackBerry and Defendants will each bear their own costs, expenses and legal fees related to these claims. As part of this Joint Motion to Dismiss and in accordance with the terms of the confidential Settlement Agreement, BlackBerry and Defendants respectfully request that the Court enter the Permanent Injunction filed herewith.

DATED: June 8, 2015

Respectfully submitted,

COOPER & DUNHAM LLC

By: /s/ Wendy E. Miller

Wendy E. Miller
Attorney for Defendants Typo Products LLC and
Show Media LLC

O'MELVENY & MYERS LLP

By: /s/ Brian M. Berliner

Brian M. Berliner
Attorney for Typo Products LLC, Typo
Innovations, LLC, Show Media, LLC, Hallier
Investments LLC and Laurence Hallier

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/ Todd M. Briggs

Todd M. Briggs
Attorney for Plaintiff BlackBerry Limited

ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3) regarding signatures, I, Todd M. Briggs, attest that concurrence in the filing of this document has been obtained from each of the other signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 8th day of June 2015, in Redwood Shores, California.

By: /s/ Todd M. Briggs
Todd M. Briggs